

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date:

Region: Raleigh Regional Office
County: Lee
NC Facility ID: 5300024
Inspector's Name: Stanley Williams
Date of Last Inspection: 12/14/2016
Compliance Code: 3 / Compliance - inspection

<p align="center">Facility Data</p> <p>Applicant (Facility's Name): Lee Brick and Tile Company, Inc.</p> <p>Facility Address: Lee Brick and Tile Company, Inc. 3704 Hawkins Avenue Sanford, NC 27331</p> <p>SIC: 3251 / Brick and Structural Clay Tile NAICS: 327121 / Brick and Structural Clay Tile Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>				<p align="center">Permit Applicability (this application only)</p> <p>SIP: 15A NCAC 02Q .0513 NSPS: NA NESHAP: NA PSD: NA PSD Avoidance: NA NC Toxics: NA 112(r): NA Other: NA</p>																																																			
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<p>Review Engineer: Lori Ann Phillips</p> <p>Review Engineer's Signature: Date:</p>					<p align="center">Comments / Recommendations:</p> <p>Issue: 03464/T27 Permit Issue Date: Permit Expiration Date:</p>																																																		

1. Purpose of Application:

Lee Brick and Tile Company, Inc. (Lee Brick) submitted a permit renewal application that was received by the Raleigh Regional Office on February 28, 2017 and was considered complete on that date. The application was received in the Raleigh Central Office on March 2, 2017. The facility is located at 3704 Hawkins Avenue in Sanford, Lee County, and is currently operating under air quality permit No. 03464T26 which expires on November 30, 2017. The permit renewal application was received at least nine months prior to the current permit's expiration date; therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

2. Facility Description:

Lee Brick manufactures brick and its facility consists of four plants located at the property. Plants 1 and 2 have common crushing and milling equipment while Plants 3 and 4 have separate equipment. Approximately 130 million Standard Brick Equivalents (SBEs) are produced, using a variety of processes, by the facility annually. Production processes include stone milling, clay manufacturing, kiln firing, and curing (drying). The facility mines its raw material on site.

Additional information regarding SBEs can be found in the most recent permit inspection from December 14, 2016.

3. Application Chronology:

February 28, 2017	Received renewal permit application at RRO.
March 2, 2017	Received renewal permit application at RCO. Application package included all necessary forms, signatures, and supporting data. The application was deemed complete as of February 28, 2017.
March 3, 2017	Sent acknowledgement letter to J.R. Holton, Secretary/Treasurer of Lee Brick and Tile Company.

4. New Equipment/Changes in Emissions and Regulatory Review:

New Equipment: There is no new equipment associated with this permit renewal.

Change in Emissions: There are no changes in equipment associated with this permit renewal.

Regulatory Review: All regulations currently listed in the permit have been reviewed and are correct. No changes are required at this time. For discussion regarding any of the permit stipulations, please consult previous permit review documents.

5. Changes to Permit:

- Updated all dates and permit revision numbers
- Changed the name of the department to "Department of Environmental Quality"
- Added the leading "0" to all NC Administrative Code citations

- Updated the General Conditions to version 4.0
- Removed the air-to-cloth ratio from the description of the bagfilters and placed the filter surface area (ft²) in the bagfilter description instead. This was done per a request from the Raleigh Regional Office in agreement with the applicant.

6. NSPS, NESHAPS, MACT, PSD, and Attainment Status:

This facility is currently subject to NSPS Subpart OOO. Lee Brick is not subject to any NESHAP or MACT and is a PSD minor source for all criteria pollutants. This facility is located in Lee County, which is in attainment for all criteria pollutants.

Lee Brick is also subject to the 112(j) Case-by-Case MACT for Brick Manufacturers, 15A NCAC 02D .1109, that had an initial compliance date of December 6, 2015.

7. Facility Wide Air Toxics:

This permit renewal does not trigger an air toxics review.

8. Compliance Status:

The facility was in compliance during the most recent inspection conducted on December 14, 2016 by Stan Williams.

9. Facility Emissions Review:

The emissions summary in the table below is based on the facility-wide emissions summary provided in the permit renewal application.

Facility Emissions Summary

Pollutant	Permit Potential Emissions (tpy)
TSP	258.2 *
PM-10	184.1
PM-2.5	49.9
SO₂	0.3
NO_x	76.2
VOC	5.6
CO	253.0

Based on the emissions summary, this facility is correctly classified as a Title V.

* TSP is greater than 250 tons per year but the regulated pollutant for calculating the major source status for PSD is PM10 which is below 250 tons per year.

10. Other Considerations:

- A P.E. seal is NOT required for this application.
- A zoning consistency determination is NOT required for this application.
- This facility is not subject to the 112(r) program as it does not store any of the listed chemicals in quantities above the program thresholds.

11. Public Notice Review:

A 30-day public notice and 45-day EPA review period is required for this permit renewal.

The 30-day public notice period was from XX through XX.

The EPA 45-day review period was from XX through XX.

12. Conclusions, Comments, and Recommendations:

This air permit application for the Lee Brick and Tile Company, Inc., located at 3704 Hawkins Avenue in Lee County, has been reviewed by DAQ to determine compliance with all procedures and requirements. The Raleigh Regional Office made comments on the draft permit and pertinent comments were included in the Air Permit and engineering review. Continued compliance with this air permit is expected.

Recommend issuance of revised air permit No. 03464T27.